

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE:

CHAPTER 11

SEARS HOLDINGS CORPORATION, *ET AL.*,

CASE No. 18-23538 (RDD)

DEBTORS.

(JOINTLY ADMINISTERED)

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**NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE, that SUSO 4 Ocean LP and Maynardville Pike LP, parties-in-interest and potential claimants, appear herein by their counsel, LIPPES MATHIAS WEXLER FRIEDMAN LLP, and pursuant to FED. R. BANKR. P. 2002, 7005 and 9010, demand that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon the undersigned at the following address, telephone number and e-mail:

LIPPES MATHIAS WEXLER FRIEDMAN LLP  
John A. Mueller, Esq.  
50 Fountain Plaza, Suite 1700  
Buffalo, New York 14202-2216  
(716) 362-7614  
[jmueller@lippes.com](mailto:jmueller@lippes.com)

PLEASE TAKE FURTHER NOTICE, that the foregoing demand includes not only the notices and papers referred to in the rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise, which may effect, or seek to affect in

any way any rights or interests of the above parties with respect to the Debtors or any property or proceeds in which the Debtors may claim an interest.

PLEASE TAKE FURTHER NOTICE, that the foregoing constitutes a request for service of papers only and is not intended to waive any rights of the above parties, including, but not limited to: (i) the right to contest the jurisdiction of the Bankruptcy Court including, without limitation, the jurisdiction of the Bankruptcy Court to adjudicate non-core matters, which right is hereby expressly reserved without prejudice; (ii) the right to trial by jury should such right be relevant in the course of these proceedings; or (iii) any other rights, claims, actions, defenses, setoffs, or recoupments to which the above parties may be entitled in law or in equity, all of which are hereby expressly reserved.

Dated: November 15, 2018  
Buffalo, New York

**LIPPES MATHIAS WEXLER FRIEDMAN LLP**

/s/ John A. Mueller

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· *Counsel to SUSO 4 Ocean LP and  
Maynardville Pike LP*